



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

In Response
Reply To: H-3-3,
EPA ID#: CA9570025149

03 MAY 1990

Colonel Orville G. Robertson
Director, Environmental Management
Department of The Air Force
Vandenberg Air Force Base
California, 93437-5000

Subject: Part A and Part B Applications
for Resource Conservation and Recovery Act (RCRA)

Dear Colonel Robertson:

This letter is in response to your request dated November 28, 1989 to amend your facility's RCRA Part A application (Part A amendment dated September 1, 1989), and your RCRA Part B submittal dated July 19 1989.

In accordance with Part 270 of Title 40 of Code of Federal Regulations (40 CFR 270.72(a)(3)(i)) we accept your amended Part A. You may conduct Open Burning/Open Detonation (OB/OD) activities included as process code T04 in the September 1, 1989 Part A, under Interim Status (I.S) until we make a determination on your permit application. You may also continue to use the storage area(s) subject to I.S. Although the application does not contain enough information on the other processes (freon recovery unit, solvent recovery units, acid/base neutralization, removal of metals from rinsewaters, and a hydrazine and metals wastewater treatment) included in the Part A, it appears that these activities will not require a RCRA permit because of the following provisions:

- o Freon and solvent recovery units are recycling units and do not require RCRA Permit pursuant to 40 CFR Part 264.1(g)(2). However, the still bottoms from these units may be hazardous depending on the type of solvent being recovered.
- o Acid/Base neutralization system appears to be elementary neutralization exempted from RCRA by 40 CFR 264.1(g)(6).
- o Wastewater treatment system discharges to a Publicly Owned Treatment Works (POTW) system or under a National Pollutant Discharge Elimination System (NPDES) permit,

would be exempt from RCRA permitting.

- o Metal recovery unit appears to be a RCRA exempt recycling unit. If the unit discharges to POTW or is covered by a NPDES permit, it is RCRA exempt.

To make a RCRA permit determination we will review your complete Part B application for storage and OB/OD activities.

We have reviewed your Part B RCRA permit application submittal dated July 19, 1989 and have found it very deficient. The enclosed attachment lists the areas of the deficiencies which must be addressed in your revised Part B application. You must provide a complete RCRA Part B application to our office and California Department of Health Services not later than October 1, 1990. If a complete Part B is not received by October 1, 1990, EPA may begin RCRA permit denial proceedings.

Please also note that your facility may require other permits to be issued by the state and/or local agencies. You must contact the appropriate agencies for these requirements.

Please call Nahid Zoueshtiagh at (415) 744-1784 if you have any questions on this subject.

Sincerely,



Jeffrey Zelikson, Director
Hazardous Waste Management Division

cc: California Department of Health Services, Region 3:
Jose Kou and Will White

enclosure